

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

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IN RE:

Chapter 12

Case No. 3:14-bk-02690-JAF

Pedro Saavedra and Viviana Saavedra

Debtors.

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**OBJECTION TO DEBTOR'S MOTION FOR
VALUATION OF PROPERTY OF THE ESTATE**

Comes now Nationstar Mortgage LLC, by and through its undersigned attorney, and hereby files its objection to Debtor's Motion for Valuation (Doc. 28) and states as follows:

1. On June 27, 2014 Debtor filed its Motion for Valuation against BAC Home Loans Servicing, L.P.
2. Debtor's motion did not identify the subject mortgage(s) by official records book and page encumbering the subject real property by common address.
3. Nationstar Mortgage LLC holds a first mortgage originally given by Bank of America, N.A. in the original amount of \$134,800.00 dated July 12, 2006 and recorded at Official Records Book 1311 Page 139 Suwannee County official records and subsequently assigned to Nationstar Mortgage LLC recorded at Official Records Book 1718 Page 352 on October 22, 2012 and encumbering real property bearing a common address of 9131 240th Street, O'Brien, FL 32071 and bearing a legal description of:

Part Of The Se 1/4 Of The Se 1/4 Of Section 29, 1 Township 5 South, Range 14 East, Suwannee County, Florida Being More Particularly Described As Follows:

For Point Of Reference Commence At The Southeast Corner Of Said Section 29; Thence Run S 88° 36'31" W, Along The South Line Of Said Section 29, A Distance Of 329.74 Feet; Thence Run N 01° 19' 58" W, A Distance Of 34.45 Feet To The North Right-Of-Way Line Of 240th, Street And The Point Of Beginning; Thence Run S 88° 49' 23" W, Along Said North Right-Of-Way Line, A Distance Of 275.00 Feet; Thence Run N 01° 19' 58" W, A Distance Of 1285.77 Feet To The North Line Of Said Se 1/4 Of The Se 1/4; Thence Run N 88° 38' 07" E,

Along Said North Line, A Distance Of 275.00 Feet; Thence Run S 01° 19' 58" E, A Distance Of 1286.67 Feet To The Point Of Beginning.

4. In the event the Debtor is seeking to value the subject property which is encumbered by the mortgage of Nationstar Mortgage LLC the Debtor failed to provide sufficient information to determine the fair market value of the property is \$100,000.00.

5. The claims bar date is October 7, 2014. No claim has been filed for the subject mortgage referenced above and the amount of indebtedness at the time this case was filed has not been determined.

6. An interior appraisal is required in order to determine the value of the subject property.

7. The Debtor did not take any exemptions on Schedule C.

8. Notwithstanding the lack of any exemptions the mortgage may be encumbering the principle residence of the Debtor and may not be subject to valuation.

9. Additional discovery may be needed to determine if this mortgage is subject to modification.

10. A hearing on the motion should take approximately 10 minutes.

Wherefore Nationstar Mortgage LLC prays that this Honorable Court deny Debtor's Motion For Valuation of Property of the Estate.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing objection was furnished by
U.S. Mail and/or via CM/ECF electronic filing this 22nd day of July 2014, to the following:

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